

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

INDICTMENT

- v. -

18 Cr.

FELIX JACOB SALOMON GUILLEN,
a/k/a, "Jacob Salomon," and
GLADYS DIAMOND,

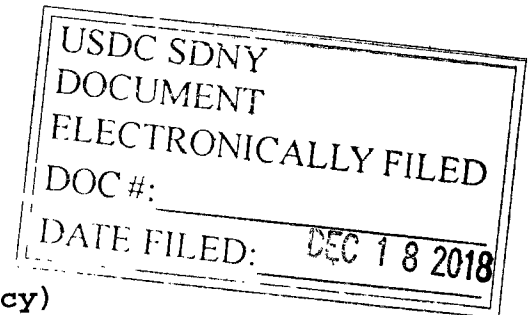
18 CRIM 899

Defendants.

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COUNT ONE

(Wire Fraud Conspiracy)



The Grand Jury charges:

1. From at least in or about February 2014, up to and including in or about February 2018, in the Southern District of New York and elsewhere, FELIX JACOB SALOMON GUILLEN, a/k/a "Jacob Salomon," and GLADYS DIAMOND, the defendants, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343.

2. It was a part and object of the conspiracy that FELIX JACOB SALOMON GUILLEN, a/k/a "Jacob Salomon," and GLADYS DIAMOND, the defendants, and others known and unknown, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by

JUDGE KAPLAN

means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

(Title 18, United States Code, Section 1349.)

COUNT TWO

(Wire Fraud)

The Grand Jury further charges:

3. From at least in or about February 2014, up to and including in or about February 2018, in the Southern District of New York and elsewhere, FELIX JACOB SALOMON GUILLEN, a/k/a "Jacob Salomon," and GLADYS DIAMOND, the defendants, willfully and knowingly, having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, and attempting to do so, transmitted and caused to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, to wit, SALOMON, DIAMOND, and others known and unknown, participated in a scheme to

defraud, by telephone, email, and wire transfers of funds, among other means and methods, a New York City-based publishing company ("Publishing Company-1"), by causing a marketing company ("Vendor-1") under the control of SALOMON, DIAMOND, and others known and unknown, to submit false, fraudulent, and inflated invoices to Publishing Company-1 that did not reflect the work, if any, performed by Vendor-1 and, in furtherance of that scheme, caused bank wire transactions to be transmitted from New York, New York.

(Title 18, United States Code, Sections 1343 and 2.)

FORFEITURE ALLEGATIONS

4. As a result of committing the offenses alleged in Counts One and Two of this Indictment, FELIX JACOB SALOMON GUILLEN, a/k/a "Jacob Salomon," and GLADYS DIAMOND, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c) any and all property, real and personal, that constitutes or is derived from, proceeds traceable to the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses that the defendants personally obtained.

Substitute Assets Provision

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



Foreperson



GEOFFREY S. BERMAN
United States Attorney

Form No. USA-338-274 (Ed. 9-25-58)

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SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

FELIX JACOB SALOMON GUILLEN,
a/k/a, "Jacob Salomon," and
GLADYS DIAMOND,

Defendants.

INDICTMENT

18 Cr. ____

(18 U.S.C. §§ 1343, 1349, and 2.)

GEOFFREY S. BERMAN

United States Attorney.

A TRUE BILL

 Foreperson.

12/18/18
Filed Indictment. Case assigned to Judge Kaplan.
U.S.M.S. Debra Freeman